



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 26 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7001 0320 0006 1452 2546
RETURN RECEIPT REQUESTED

Mr. Benjamin Davis
EH&S Specialist
Morton Grove Pharmaceuticals, Inc.
6451 West Main Street
Morton Grove, Illinois 60053

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 984 774 877

Dear Mr. Davis:

On September, 2014 a representative of the U.S. Environmental Protection Agency inspected the Morton Grove Pharmaceuticals, Inc. (MGP) facility located in Morton Grove, Illinois. As a "large quantity generator" of hazardous waste, MGP is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate MGP's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by MGP, EPA's review of records pertaining to MGP, and the inspector's observations, EPA has determined that MGP at the time of the inspection was out of compliance with the following large quantity record keeping and reporting requirements:

1. Hazardous Waste Manifests

Under Ill. Admin. Code tit. 35 § 722.140(a), [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

At the time of the inspection, MGP did not have a final signed copy from the Treatment, Storage, and Disposal Facility for the following manifests:

Year	Manifest Tracking Number	Date of Shipment
2012	009533546 JJK	5/17/2012
	009648800 JJK	10/19/2012
	009648544 JJK	8/8/2012
	010775670 JJK	12/21/2012
	008913125 JJK	2/24/2012
2013	010564565 JJK	7/30/2013
	011903058 JJK	12/12/2013
	011911329 JJK	10/3/2013
	010775984 JJK	3/7/2013
	011062698 JJK	4/23/2013
	011062785 JJK	5/9/2013

2. Annual Hazardous Waste Reports

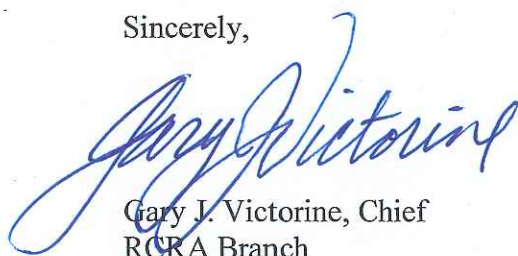
Under Ill. Admin. Code tit. 35 § 722.141(a), a generator that ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of an annual report to Illinois Environmental Protection Agency (Illinois EPA) by March 1 for the preceding calendar year.

Based on the review of records at the time of the inspection, MPG did not submit its 2013 Annual Hazardous Waste Report to the Illinois EPA until March 6, 2014.

After the inspection, on September 19, 2014, in an email to EPA, MGP submitted complete copies of the waste manifests listed above. Based on this information, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates MGP's cooperation.

If you have any questions regarding this letter, please contact Mr. Spiros Bourgikos, of my staff, at 312-886-6862, or at bourgikos.spiros@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)



U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Morton Grove Pharmaceuticals, Inc.


EPA ID NUMBER: EPA ID: ILD 984774877

ADDRESS: 6451 West Main Street
Morton Grove, IL 60053

DATE OF INSPECTION: September 8, 2014


EPA INSPECTOR: Spiros Bourgikos
Environmental Engineer

PREPARED BY:


Spiros Bourgikos
Compliance Section 1

3-18-2015
Date

APPROVED BY:


Michael Cunningham Chief
Compliance Section 1

3-23-15
Date

Purpose of Inspection

This inspection was an evaluation of the Morton Grove Pharmaceutical, Inc.'s (MGP) compliance with hazardous waste, used oil, and universal waste regulations found at Illinois' hazardous waste management rules codified at 35 IAC Parts 700-739 and the Code of Federal Regulations (CFR) at 40 CFR Parts 260-270, 273 and 279. The Illinois Environmental Protection Agency (Illinois EPA) was invited to participate in this inspection but declined. The site has notified as a large quantity generator (LQG).

Participants

Inspector(s):

Spiros Bourgikos, Environmental Engineer, EPA

Site Representative(s):

Benjamin Davis, EH&S Specialist, MGP

Introduction

On September 8, 2014 I arrived at the site at approximately 10:30 AM. I introduced myself, presented my inspector credentials, and business card, and described the purpose and process by which I intended to conduct the inspection. Mr. Davis provided me with a description of the site operations. Mr. Davis led the tour and provided me with the records I requested for review.

I provided a Small Business Resources information sheet to Mr. Davis. I also informed Mr. Davis that MPG could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. MGP did not make a CBI claim on the information gathered during the inspection.

Site Description

MGP develops, manufactures and markets prescription oral liquid and topical liquid pharmaceuticals. It offers prescription generic drugs, prescription non-generic drugs and over the counter generic products. These products include cough syrups, burn creams, nasal sprays. It also produces lindane (hexachlorocyclohexane) shampoo and lindane lotion. MGP distributes its products through wholesalers, chain drug stores and distributors in the United States. The company was incorporated in 1990. As of October 24, 2007, MGP operates as a subsidiary of India's Wockhardt Inc. This facility generates about half of Wockhardt's sales in the United States.

The MGP Plant includes two laboratories (one R&D Lab and one QC Lab), the manufacturing area, a filling and labeling room, and other various storage and quarantined areas. There is a dedicated room for any activities dealing with lindane. This room does not have any drains.

Ninety percent of the hazardous waste generated at this facility comes from the two labs. In 2013 MGP generated 17 tons of hazardous waste. EPA hazardous waste numbers included D001, D002, D013, F003 and U129.

Lindane waste (U129) is stored in 55-gallon drums or the original product container. Laboratory hazardous waste is stored in 5 gallon containers in flammable liquid cabinets. The hazardous waste storage area is located at the southwest corner of the warehouse. Lab waste is shipped every six weeks. Lindane waste is generated once a year.

Site Tour

During the facility walkthrough I visited the two labs and the hazardous waste storage area. I took photographs of the various waste storage/accumulation areas during the site tour. See Attachment B for photographs taken during the inspection.

We started the tour at the QC Lab. Area and proceeded to walk through the facility. At the QC Lab there are approximately 24 High Power Liquid Chromatographs (HPLCs). Each HPLC is connected to a five gallon waste collector container. Once the container is full it is moved to the flammable liquid cabinet.

Next we visited the R&D Lab. There I observed three satellite containers. All three containers were labeled with the words "Hazardous Waste" and were closed.

From the R&D Lab we headed for the hazardous waste storage area. At the time of the inspection the only waste stored here was inside a flammable proof cabinet (See Picture Nos. 4 and 5). These containers were properly labeled and were closed.

Records Review

During the inspection I reviewed the following records. Hazardous waste manifests, land disposal restriction notifications (LDR), training records, inspection records, annual hazardous waste reports, waste analysis records, manifests, and the contingency plan. I also completed the LQG checklist during the records review, *see* Attachment C.

During the records review I requested that MGP provide copies of certain documents that are listed in Attachment D. None of these documents were claimed to be CBI.

Hazardous Waste Records

During this inspection I reviewed the waste manifests for 2012, 2013 and 2014. The following waste manifests were missing the signature of the facility designated to receive the hazardous waste.

Table 1

Year	Manifest Tracking Number	Date of Shipment
2012	009533546 JJK	5/17/2012
	009648800 JJK	10/19/2012
	009648544 JJK	8/8/2012
	010775670 JJK	12/21/2012
	008913125 JJK	2/24/2012
2013	010564565 JJK	7/30/2013
	011903058 JJK	12/12/2013

	011911329 JJK	10/3/2013
	010775984 JJK	3/7/2013
	011062698 JJK	4/23/2013
	011062785 JJK	5/9/2013

Training Records

I reviewed the training records including the annual refresher training records for 2011, 2012 and 2013. The training records contained all information required under 35 IAC 725.116.

Inspection records

I checked the weekly inspection records of the 90-day hazardous waste storage area for 2011, 2012 and 2013. I did not find any missing weekly inspections.

Annual Hazardous Waste Report

I reviewed the 2011, 2012 and 2013 Annual Hazardous Waste Report. These reports were submitted to Illinois EPA on February 15, 2012, February 27, 2013 and March 6, 2014.

Contingency Plan

The contingency plan was last updated on March 17, 2014 and appeared to contain all the information required by 35 IAC 725.152.

Waste Determination

During the inspection I requested to review the profiles of some of the waste generated by MGP. Based on these records, MGP is making proper waste determinations.

Closing Conference

I summarized the issues identified during the inspection. I again mentioned that MGP could make claims of CBI on the material copied, photographs, and information gathered during the inspection. Mr. Davis did not make any CBI claims. The inspection concluded at approximately 1:30 PM.

Post-Inspection

On September 19, 2014, Mr. Davis emailed me complete copies of all the manifests listed in Table 1 as a supplement to the inspection.. These documents are located in Appendix E.

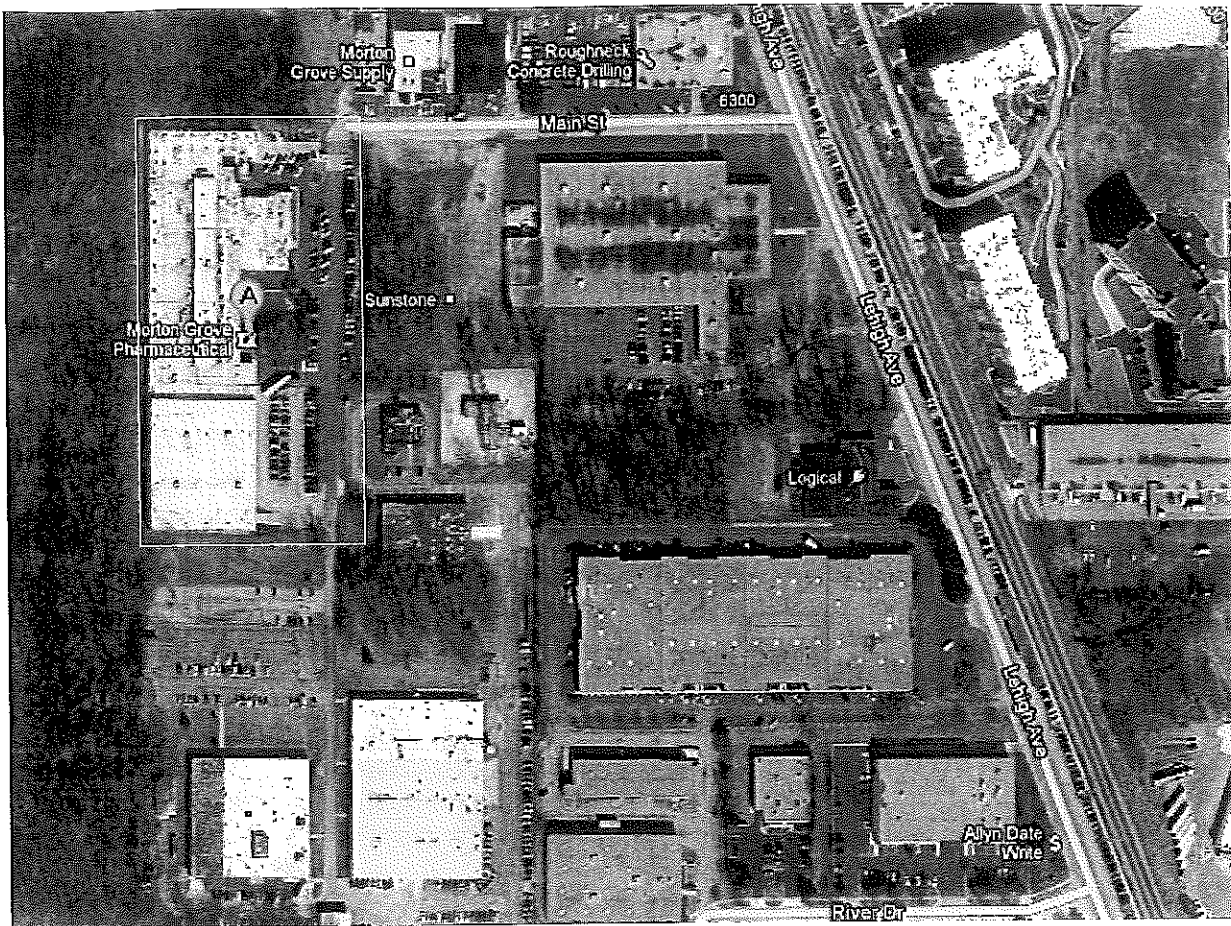
Attachments

- A. Site Diagram
- B. Photographs and Log
- C. Checklist(s)
- D. Document(s) Copied
- E. Post-Inspection Documents

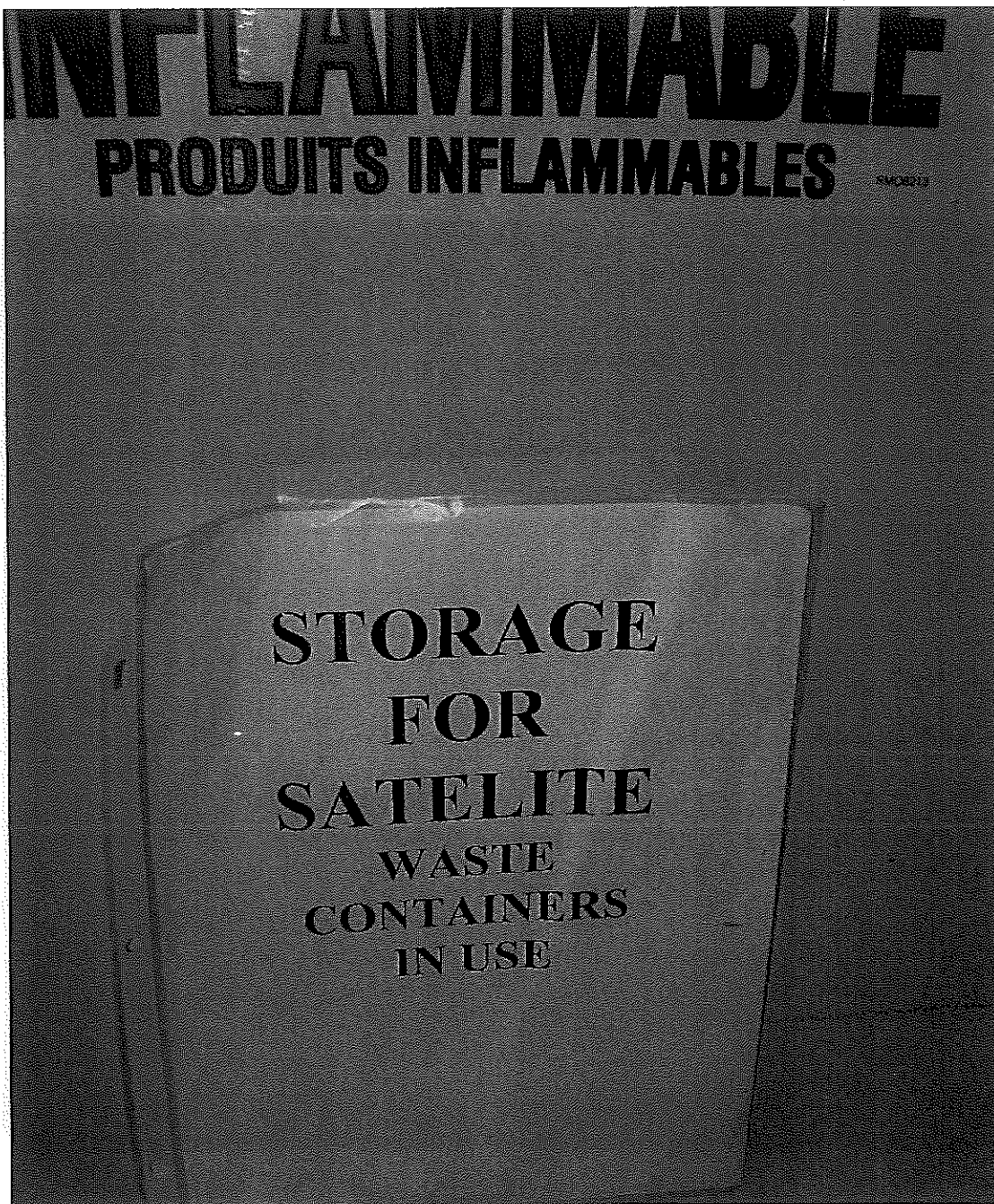
ATTACHMENT A

Site Diagram

Exhibit 1 – Site Location Map



ATTACHMENT B
Photographs



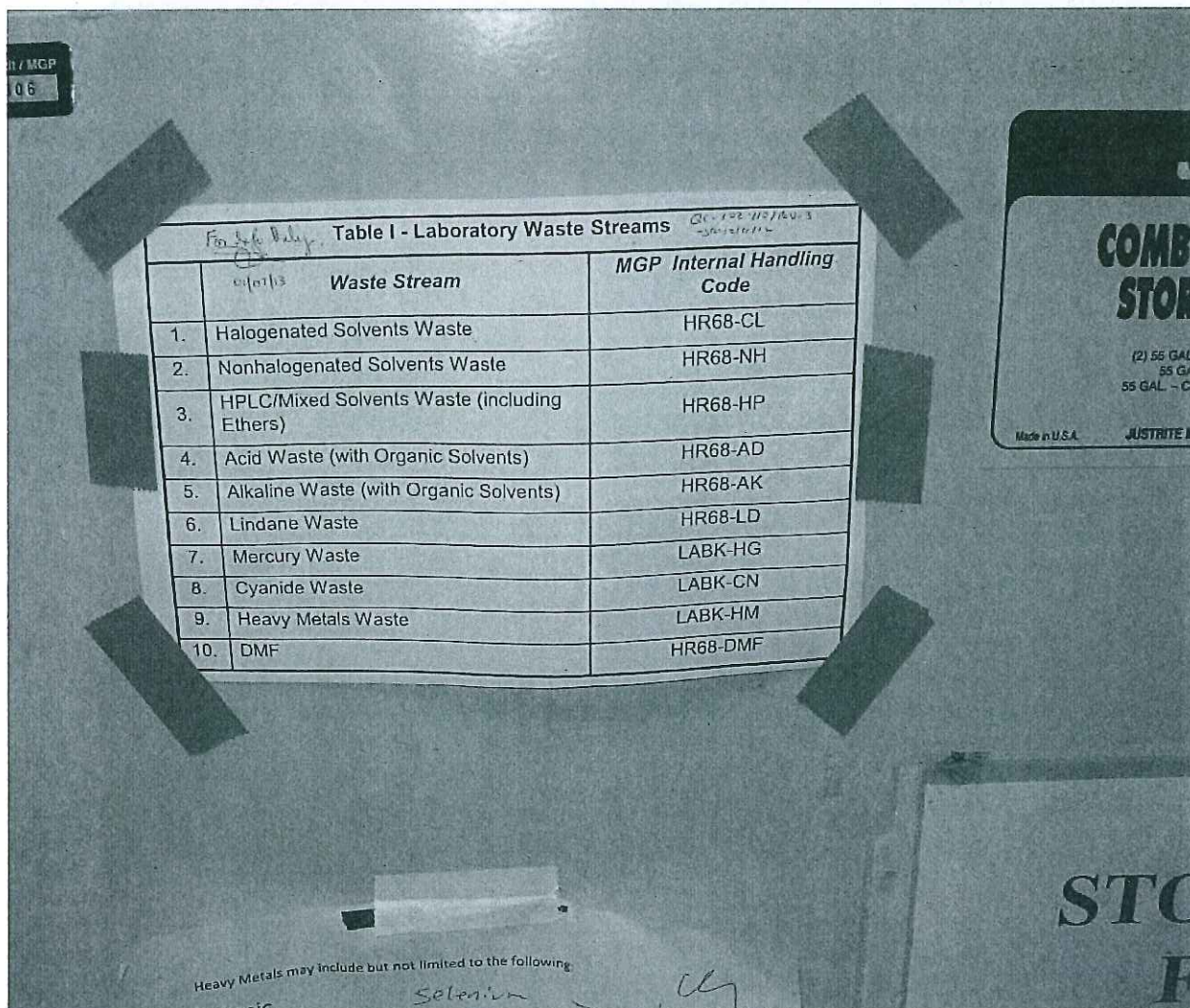
Picture # 1

Date: September 8, 2014

Photographer: Spiros Bourgikos

Location: Morton Grove Pharmaceuticals, Morton Grove, Illinois

Subject: Storage cabinet for satellite waste containers.



Picture # 2

Date: September 8, 2014

Photographer: Spiros Bourgikos

Location: Morton Grove Pharmaceuticals, Morton Grove, Illinois

Subject: List of lab waste streams stored in the cabinet shown in Picture #1.



Picture # 3

Date: September 8, 2014

Photographer: Spiros Bourgikos

Location: Morton Grove Pharmaceuticals, Morton Grove, Illinois

Subject: Empty containers used for satellite storage.



Picture # 4

Date: September 8, 2014

Photographer: Spiros Bourgikos

Location: Morton Grove Pharmaceuticals, Morton Grove, Illinois

Subject: Hazardous waste stored in a flammable liquid cabinet. This waste was generated at the QC Lab.



Picture # 5

Date: September 8, 2014

Photographer: Spiros Bourgikos

Location: Morton Grove Pharmaceuticals, Morton Grove, Illinois

Subject: A close up of the labels attached to the containers shown in Picture #4

ATTACHMENT C

Checklist

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A _____	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A _____	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No _____ N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes _____ No _____ N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A _____	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	<i>Containers stored in closed cabinets</i>
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS <i>NO</i></p>	
(725.211) (725.214)	<p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	725.214

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes <u> </u> No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____ 	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overflow prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overflow/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <u>Y</u> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <u>Y</u> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes _____ No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <u>✓</u> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <u>✓</u> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <u>✓</u> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <u>✓</u> No _____ N/A _____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <u>✓</u> No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes <u>✓</u> No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes <u>✓</u> No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <u>✓</u> No _____ N/A _____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <u>✓</u> No _____ N/A _____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <u>✓</u> No _____ N/A _____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes _____ No <u>✓</u> N/A _____ If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A _____	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <u>✓</u> No _____ N/A _____ - explosions? Yes <u>✓</u> No _____ N/A _____ - releases? Yes <u>✓</u> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? <ul style="list-style-type: none"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? <ul style="list-style-type: none"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? <ul style="list-style-type: none"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	Is the plan on-site? Yes _____ No _____ N/A _____	
	Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A _____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A _____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A _____	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A _____	
	If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No <input checked="" type="checkbox"/> N/A _____	one drum was not labeled
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A _____	722.142(a)(2)
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE <i>No</i> Is the generator an exporter of hazardous waste? Yes _____ No _____ N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A _____	722.143
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE <i>NO</i> Is the generator an importer of hazardous waste? Yes _____ No _____ N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A _____	722.150
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes _____ No _____ N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A _____	722.160
	COMMENTS:	722.170

ATTACHMENT D
Document(s) Copied

Inspection Document Log

Facility Name: Morton Grove Pharmaceuticals

Location: Morton Grove Illinois

Document No.	Document Description	Received	CBI Claim
1	Environmental Incident Control Plan (34 pages)	9/8/2014	No
2	Hazardous Waste Storage and Disposition SOP (6 pages)	9/8/2014	No
3	Training records (3 Pages)	9/8/2014	No
4	2013 Waste Shipment Summary (2 Pages)	9/8/2014	No

ATTACHMENT E
[Post-Inspection Documents]

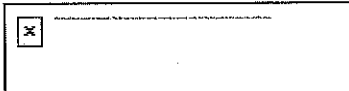
Bourgikos, Spiros

From: Ben Davis <bdavis@mgp-online.com>
Sent: Friday, September 19, 2014 5:05 PM
To: Bourgikos, Spiros
Subject: MGP Manifests 2012
Attachments: removed.txt; 10.19.2012.pdf; 12.21.2012.pdf; 02.24.2012.pdf; 05.08.2012.pdf; 05.17.2012.pdf; 08.08.2012.pdf

Spiros,

Please see attached 2012 manifests

Benjamin Davis
EH&S Specialist I
Morton Grove Pharmaceuticals, Inc.
6451 Main Street
Morton Grove, IL 60053
Phone: 847-410-6758



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836131

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ILD984774877		2. Page 1 of 3	3. Emergency Response Phone 800-388-7242		4. Manifest Tracking Number 009533546 JJK			
5. Generator's Name and Mailing Address MORTON GROVE PHARMACEUTICALS 6451 WEST MAIN STREET MORTON GROVE, IL 60053					Generator's Site Address (if different than mailing address)					
Generator's Phone: 847-410-6757					U.S. EPA ID Number INR000123497					
6. Transporter 1 Company Name THUNDERBIRD TRUCKING, LLC					U.S. EPA ID Number					
7. Transporter 2 Company Name					U.S. EPA ID Number					
8. Designated Facility Name and Site Address TRADEBE TREATMENT AND RECYCLING LLC 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312					U.S. EPA ID Number IND000648943					
Facility's Phone: 219-397-3951										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (DIMETHYLFORMAMIDE, NYSTATIN), ERG128			2	DF	90	P	D001	
	X	2. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (ACETONITRILE, METHANOL), ERG128			6	DF	300	P	D001 F003	
	X	3. RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (TETRACHLOROETHYLENE CHLOROFORM), ERG128 (RQ-D001)			11	DM	4400	P	D001 F003	
	X	4. UN2924, WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S., 3(8), PGII, (ISOPROPANOL, POTASSIUM HYDROXIDE), ERG132			1	DF	50	P	D001 D002	
14. Special Handling Instructions and Additional Information Emergency Response Provider: TRADEBE TREATMENT AND RECYCLING LLC CONFIRM LP-EMORT11 TRUCK#42 [1]1361038(LF)2x5DF [2]50021305(ZV1)6x5DF [3]706841(LF)11x55DM [4]50014180VC(VCH)1x5DF										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offor's Printed/Typed Name X William Sheridan										
Signature X William Sheridan Month Day Year 5 17 12										
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:									
	Transporter signature (for exports only):									
	17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name JOHN PARISE Signature John Parise Month Day Year 5 17 12										
Transporter 2 Printed/Typed Name Signature Month Day Year										
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	Manifest Reference Number:									
	18b. Alternate Facility (or Generator) U.S. EPA ID Number									
	Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. H001 2. H001 3. H001 4. H001										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Kimberly Addison Signature Kimberly Addison Month Day Year 5 17 12										

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number ILD984774877		22. Page 2 of 3		23. Manifest Tracking Number 009533546 JJK	
24. Generator's Name MORTON GROVE PHARMACEUTICALS							
25. Transporter _____ Company Name				U.S. EPA ID Number			
26. Transporter _____ Company Name				U.S. EPA ID Number			
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
X	5) UN1325, WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S., 4.1, PGII, (SOLVENT SOAKED RAGS, CHROMATOGRAPHY TUBES), ERG133	1	DF	75	P	D001	
X	6) UN3099, WASTE OXIDIZING LIQUID, TOXIC, N.O.S., 5.1(6.1), PGII, (LEAD NITRATE, SODIUM NITRATE), ERG142	1	DF	10	P	D001	D008 D007
X	7) UN1680, WASTE POTASSIUM CYANIDE, SOLID, 6.1, PGI, (POTASSIUM CYANIDE), ERG157	1	DF	2	P	D003	P098
X	8) RQ, UN2810, WASTE TOXIC, LIQUIDS, ORGANIC, N.O.S., 6.1, PGII, (TETRACHLOROETHYLENE CHLOROFORM), ERG153 (RQ=D009)	3	DF	150	P	D009	D019 D021 D022 D039 D040
X	9) UN1092, WASTE ACROLEIN, STABILIZED, 6.1(3), PGI, (ACROLEIN), ERG131P (POISON INHALATION HAZARD ZONE A) (DOT-SP 13192)	1	CF	5	P	D001	D003
X	10) UN3262, CORROSIVE SOLID, BASIC, INORGANIC, N.O.S., 8, PGII, (POTASSIUM HYDROXIDE), ERG154	1	DF	5	P	none	
X	11) UN3264, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S., 8, PGII, (SULFURIC ACID, PHOSPHORIC ACID), ERG154	1	DF	10	P	D002	
X	12) UN3093, WASTE CORROSIVE LIQUIDS, OXIDIZING, N.O.S., 8(5.1), PGII, (PERCHLORIC ACID, METHANOL), ERG140	8	DF	400	P	D001	D002 F003
X	13) UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., 8(6.1), PGII, (LEAD, SELENIUM SULFIDE), ERG154	2	DF	100	P	D008	D002
X	14) RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PGII, (LINDANE, BENZENE HEXACHLORIDE), ERG171 (RQ=D013, U129)	4	DF	400	P	D013	U129
32. Special Handling Instructions and Additional Information [5]LP-EMORT11-1(ZN)1x15DF [6]LP-EMORT11-4(ZI)1x5DF [7]LP-EMORT11-2(ZP2)1x5DF [8]707172(LI)3x5DF F002 D001 [9]5001507(LI)7x5DF [10]4001507(LI)7x5DF [11]LP-EMORT11-3(ZCH)1x5DF [11]LP-EMORT11-5(ZA)1x5DF [12]50014179(LP7)8x5DF 50014814 706839							
33. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
35. Discrepancy							
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 5 Hold 16 H141 17 H141 18 H141 19 H141 10 Hold 111 H141 112 H141 113 H141 114 H141							

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number ILD984774877	22. Page 3 of 3	23. Manifest Tracking Number 009533546 JJK		
24. Generator's Name MORTON GROVE PHARMACEUTICALS						
25. Transporter _____ Company Name				U.S. EPA ID Number		
26. Transporter _____ Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
X	15) RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., 9, PGIII, (LINDANE, ACETONE),ERG171 (RQ=D013,U129)	3	DM	1200	P	D013 U129 D001
X	16) RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., 9, PGIII, (LINDANE, ACETONE),ERG171 (RQ=D013,U129)	8	DM	3200	P	D013 U129 D001
X	17) UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PGIII, (UNIVERSAL WASTE-HALIDE LAMPS),ERG171	1	DF	10	P	none
X	18) UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PGIII, (NON PCB BALLASTS),ERG171	1	DF	50	P	none
X	19) RQ, UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., 9, PGIII, (LINDANE, ACETONE),ERG171 (RQ=D013,U129)	1	DF	50	P	D013 U129 D001
	20) NON RCRA / NON DOT REGULATED MATERIAL, (USED OIL)	1	DF	250	P	none
	21) NON RCRA / NON DOT REGULATED MATERIAL, (USED OIL)	1	DM	400	P	none
	22) NON RCRA / NON DOT REGULATED MATERIAL, (SODIUM BICARBONATE, SODIUM CARBONATE)	1	DF	25	P	none
	23) NON RCRA / NON DOT REGULATED MATERIAL, (FLUORESCENT LIGHTBULBS)	2	DF	20	P	none
32. Special Handling Instructions and Additional Information <div style="display: flex; justify-content: space-between;"> <div>706836 11070836(VIA)55DM 12013334(RQ)1X55DF 333948</div> <div>706838 11070838(VIA)55DM 12133334(RQ)1X55DM 333948</div> <div>1393827 117133322(FR3)1X15DF 121316033(ZV)11X15DF</div> <div>1161315082(NS)1X5DF 1191708836(LF)1X5DF 1231336256(FR1)2X4 FOOT BOX</div> </div>						
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials		Signature _____ Month _____ Day _____ Year _____			
	34. Transporter _____ Acknowledgment of Receipt of Materials		Signature _____ Month _____ Day _____ Year _____			
DESIGNATED FACILITY	35. Discrepancy					
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) <div style="display: flex; justify-content: space-between;"> <div>15 H041 V6 H041 V7 H141 V8 NA V9 H041</div> <div>20 NA 121 NA 122 NA 123 H141</div> </div>					



834/1131

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Manifest Tracking Number 009648800 JJK					
		5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) Generator's Phone:											
TRANSPORTER		6. Transporter 1 Company Name				U.S. EPA ID Number							
		7. Transporter 2 Company Name				U.S. EPA ID Number							
DESIGNATED FACILITY		8. Designated Facility Name and Site Address Facility's Phone:				U.S. EPA ID Number							
		9a. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity		12. Unit Wt./Vol.			
GENERATOR		1. 10000 LITERS FLAMMABLE LIQUID, N.O.S., 3, 1000 LITERS, 10000 LITERS, 10000 LITERS, 10000 LITERS				1		100		200			
		2. 10000 LITERS FLAMMABLE LIQUID, N.O.S., 3, 1000 LITERS, 10000 LITERS, 10000 LITERS, 10000 LITERS				1		100		200			
		3. 10000 LITERS FLAMMABLE LIQUID, N.O.S., 3, 1000 LITERS, 10000 LITERS, 10000 LITERS, 10000 LITERS				1		100		200			
		4. 10000 LITERS FLAMMABLE LIQUID, N.O.S., 3, 1000 LITERS, 10000 LITERS, 10000 LITERS, 10000 LITERS				1		100		200			
DESIGNATED FACILITY		13. Waste Codes				200		200		200			
		14. Special Handling Instructions and Additional Information											
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
		Generator's/Offoror's Printed/Typed Name <i>X Benjamin Davis</i>				Signature <i>B. Davis</i>		Month 07		Day 14		Year 12	
TRANSPORTER		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:											
		17. Transporter Acknowledgment of Receipt of Materials											
		Transporter 1 Printed/Typed Name				Signature <i>John P...</i>		Month 07		Day 14		Year 12	
		Transporter 2 Printed/Typed Name				Signature		Month		Day		Year	
DESIGNATED FACILITY		18. Discrepancy											
		18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
		18b. Alternate Facility (or Generator)				Manifest Reference Number:		U.S. EPA ID Number					
		Facility's Phone:											
DESIGNATED FACILITY		18c. Signature of Alternate Facility (or Generator)				Month 10		Day 19		Year 12			
		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
		1. H061		2. H020		3. H061		4. H061					
		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
DESIGNATED FACILITY		Printed/Typed Name <i>Sperry Bailey</i>				Signature <i>Sperry Bailey</i>		Month 10		Day 19		Year 12	

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number	22. Page	23. Manifest Tracking Number				
24. Generator's Name								
25. Transporter _____ Company Name				U.S. EPA ID Number				
26. Transporter _____ Company Name				U.S. EPA ID Number				
GENERATOR	27a. HM	27b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
			No.	Type				
32. Special Handling Instructions and Additional Information								
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials							
	Printed/Typed Name			Signature		Month	Day	Year
DESIGNATED FACILITY	34. Transporter _____ Acknowledgment of Receipt of Materials							
	Printed/Typed Name			Signature		Month	Day	Year
35. Discrepancy								
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
5) H061 16) H061 17) H020 18) H141 19) H141 10) H141 11) H141 12) H061 13) H141 14) H141								

Form Approved, OMB No. 2050-0039

GENERATOR

8361131 / 8361131

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 11 D984774877		2. Page 1 of 3		3. Emergency Response Phone 800-588-7242		4. Manifest Tracking Number 009648544 JJK	
5. Generator's Name and Mailing Address MORTON GROVE PHARMACEUTICALS 6451 WEST MAIN ST. MORTON GROVE, IL 60053						Generator's Site Address (if different than mailing address)			
Generator's Phone: 847-410-4757									
6. Transporter 1 Company Name THUNDERBIRD TRUCKING, LLC						U.S. EPA ID Number INR000123497			
7. Transporter 2 Company Name						U.S. EPA ID Number			
8. Designated Facility Name and Site Address TRADEBE TREATMENT AND RECYCLING LLC 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312						U.S. EPA ID Number IND000646643			
Facility's Phone: 219-307-3051									
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
		No.	Type						
X	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGI, (XYLENES, WATER), ERG128	5	DF	250	P	D001	F003		
X	RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGI, (XYLENES, WATER), ERG128 (RQ=D001)	10	DM	3000	P	D001	F003		
X	UN1131, WASTE CARBON DISULFIDE, 3(6.1), PGI, ERG131	1	DF	1	P	D001	F022		
X	RQ, UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3(6.1), PGI, (LINDANE, HEXANE), ERG131 (RQ=D013, D001)	6	DM	1800	P	D001	D013	F003	
14. Special Handling Instructions and Additional Information Emergency Response Provider: TRADEBE TREATMENT AND RECYCLING LLC CONFIRMALP-EMORT12 TRUCK#36 [1]50021305(ZV1)4X5DF, 1X30DF [2]706841(LF)10x55DM [3]LP-EMORT12-6(ZP)1x50DF [4]1336274(LF)6x55DM									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name Will Sheridan						Signature <i>Will Sheridan</i>		Month Day Year 8 8 12	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name STEVEN PAPPAS						Signature <i>Steven Pappas</i>		Month Day Year 8 8 12	
Transporter 2 Printed/Typed Name						Signature		Month Day Year	
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number:									
18b. Alternate Facility (or Generator)						U.S. EPA ID Number			
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator)						Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. Hold		2. Hold		3. H141		4. Hold			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name Stefanie White						Signature <i>Stefanie White</i>		Month Day Year 10 8 12	

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number ILD984774877	22. Page 2 of 3	23. Manifest Tracking Number 009548544 JJK				
24. Generator's Name MORTON GROVE PHARMACEUTICALS								
25. Transporter _____ Company Name				U.S. EPA ID Number				
26. Transporter _____ Company Name				U.S. EPA ID Number				
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
	X	5) UN1325, WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S., 4.1, PGII, (NAPHTHALENE, WATER),ERG133	1	DF	2	P	D001	U165
	X	6) UN1339, WASTE OXIDIZING LIQUID, N.O.S., 5.1, PGII, (LEAD NITRATE, WATER),ERG140	1	DF	5	P	D001	D008
	X	7) UN1810, WASTE TOXIC, LIQUIDS, ORGANIC, N.O.S., 6.1, PGII, (CHLOROFORM, WATER),ERG153	2	DF	100	P	D001	D022 F002
	X	8) UN3384, WASTE TOXIC BY INHALATION LIQUID, FLAMMABLE, N.O.S., 6.1(3), PGI, (BORON TRIFLUORIDE, METHANE),ERG131 (POISON INHALATION HAZARD ZONE B)	1	CF	2	P	D001	
	X	9) UN2827, WASTE TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S., 6.1(8), PGII, (CRESOL, WATER),ERG154	1	DF	2	P	D002	D026
	X	10) UN3264, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S., 8, PGII, (PHOSPHORIC ACID, WATER),ERG154	1	DF	5	P	D002	
	X	11) UN3265, WASTE CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S., 8, PGII, (ACETIC ACID, WATER),ERG153	1	DF	2	P	D002	
	X	12) UN2920, WASTE CORROSIVE LIQUIDS, FLAMMABLE, N.O.S., 8(3), PGII, (POTASSIUM HYDROXIDE, WATER),ERG132	1	DF	50	P	D001	D002
	X	13) UN3093, WASTE CORROSIVE LIQUIDS, OXIDIZING, N.O.S., 8(5.1), PGII, (PERCHLORIC ACID, WATER),ERG140	7	DF	350	P	D001	D002 F003
X	14) UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., 8(6.1), PGII, (LEAD, SELENIUM SULFIDE),ERG154	2	DF	100	P	D002	D008	
29. Special Handling Instructions and Additional Information [5]LP-EMORT12-4(ZN)1x5DF [6]LP-EMORT12-3(ZX1)1x5DF [7]707172(LD)2x5DF [8]LP-EMORT12-7(ZP1)1XPIHBOX [9]LP-EMORT12-2(ZU)1x5DF [10]LP-EMORT12-1(ZA1)1x5DF [11]LP-EMORT12-5(ZU)1x5DF [12]50014181(V)1x5DF [13]50014175(LP)7x5DF [14]50014814(LP)7x5DF								
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
	34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
DESIGNATED FACILITY	35. Discrepancy _____							
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 5) H0001 16) H141 17) H141 18) H141 19) H141 10) H141 11) H141 12) H001 13) H141 14) H141							

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number ILD984774877	22. Page 3 of 3	23. Manifest Tracking Number 009648544 JJK			
24. Generator's Name MORTON GROVE PHARMACEUTICALS							
25. Transporter _____ Company Name				U.S. EPA ID Number			
26. Transporter _____ Company Name				U.S. EPA ID Number			
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
		No.	Type				
X	15) UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PGIII, (NON PCB BALLAST), ERG171	1	DF	20	P	none	
X	16) RQ, UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., 9, PGIII, (LINDANE DEBRIS, WATER), ERG171 (RQ=D013, U129)	2	DF	400	P	D013 U129	
	17) BATTERIES DRY, SEALED, N.O.S. (ALKALINE BATTERIES SPENT), UNIVERSAL WASTE	1	DF	20	P	none	
	18) NON RCRA / NON DOT REGULATED MATERIAL, (SODIUM CARBONATE, SODIUM CHLORIDE)	1	DF	100	P	none	
	19) NON RCRA / NON DOT REGULATED MATERIAL, (EMPTY DRUMS)	3	DF	20	P	none	
	20) UNIVERSAL WASTE - FLUORESCENT BULBS, (FLUORESCENT LIGHT BULBS)	2	CF	25	P	none	
	21) UNIVERSAL WASTE - FLUORESCENT BULBS, (MERCURY VAPOR BULBS)	1	DF	20	P	none	
32. Special Handling Instructions and Additional Information [15] 15082(NS)1XGDF [16] 706439(ND)2XGDF [17] 16081(SR)1XGDF [18] 15063(ZV)1X300F [19] 16586(NS)2XGDF, 1X150F [20] 1338258(FR)12XCF(BOXES) [21] 1383822(FR)1X150F							
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials		Signature		Month	Day	Year
	Printed/Typed Name						
TRANSPORTER	34. Transporter _____ Acknowledgment of Receipt of Materials		Signature		Month	Day	Year
	Printed/Typed Name						
DESIGNATED FACILITY	35. Discrepancy						
DESIGNATED FACILITY	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	(5) NA (16) H141 (17) H141 (18) NA (19) NA (20) H141 (21) H141						

